REMARKS

Claims 2, 3, 6-7, 11-12, 17, and 39-40 have been canceled without prejudice.

Claims 48-54 have been added.

Claims 1, 8-10, 13, 19, 23-27, 30-31, 33-35, 38, and 41-45 have been amended. Claims 1, 38, and 41-42 have been amended to replace the word "pathogenic" with the word "cancer" and to specify that the immunogen "is not an antibody." Claim 1 has also been amended to specify that the ligand is "a folate receptor-binding ligand selected from the group consisting of folate and analogs and derivatives thereof." Claims 41-42 have also been amended to replace the word "analogue" with the word "analog." Claim 8 has been amended to include "covalent, ionic, and hydrogen bonding" in a Markush group. Claims 8-10 and 38 have been amended to specify that the ligand is "a folate receptor-binding ligand." Claim 13 has been amended to delete the word "small" and to replace the word "pathogenic" with the word "cancer." Claim 27 has been amended to delete the phrase "ligand-immunogen." Claim 41 has been amended to delete the phrase "binding site for a." Claim 43 has been amended to specify that the immunogen "is not an antibody" and to delete the phrase "capable of specific binding to a population of pathogenic cells in a host animal for specific elimination of said cells by an acquired or innate immune response, co-administered antibodies, or directly by an immune cell in the host." Claims 19, 23-26, 30-31, 33-35, and 44-45 have been amended to change their dependencies.

The Examiner has objected to claims 1, 6-26, and 28-47. Claims 6-7, 11-12, 17, and 39-40 have been canceled without prejudice. Claims 14-15 and 47 are withdrawn from consideration. Claims 1, 8-10, 13, 16, 18-26, 28-38, and 41-46 have been amended in an attempt to respond to the Examiner's objections.

Claims 2, 3, 9-14, 17, 19, 30, 31, 35, and 39-46 stand rejected under 35 U.S.C. § 112, ¶ 2. Claims 2, 3, 11-12, 14, 17, and 39-40 have been canceled without prejudice. Claims 9-10, 13, 19, 30, 31, 35, and 41-46 have been amended in an attempt to respond to the

Examiner's rejection under 35 U.S.C. § 112, ¶ 2. Although the rejected claims have been amended, Applicants do not acquiesce to the Examiner's reasons for rejection. The Examiner has rejected claims 9-12 and 41-42 because, according to the Examiner, a "folic acid analog" is not described in the claims or the specification. Applicants refer the Examiner to Applicants' arguments below in response to the rejection of these claims under 35 U.S.C. § 112, ¶ 1 based on a similar argument by the Examiner. Withdrawal of the rejection of claims 9-10, 13, 19, 30, 31, 35, and 41-46 under 35 U.S.C. § 112, ¶ 2 is respectfully requested.

The Examiner has rejected claims 1-3, 6, 8, 13, 16, 19-26, and 28-37 under 35 U.S.C. § 112, ¶ 1. Claims 2-3 and 6 have been canceled without prejudice. The Examiner contends that the specification is enabling for a method dependent upon molecules which bind to the folate receptor and the EphA2 receptor, but does not reasonably provide enablement for vitamins that do not bind to the folate receptor. Claim 1, and its dependent claims 8, 13, 16, 19-26, and 28-37, have been amended to specify a method dependent upon molecules which bind to the folate receptor. Claim 52 has been added and specifies a method dependent on molecules which bind to the EphA2 receptor. The amendments to claims 1, 8 13, 16, 19-26, and 28-37 were made to expedite prosecution of the application and in no way are intended to acquiesce to the Examiner's arguments. Withdrawal of the rejection of claims 1, 8, 13, 16, 19-26, and 28-37 under 35 U.S.C. § 112, ¶ 1 is respectfully requested.

Claims 1-6, 8-13, 16, 18-26, and 28-47 stand rejected under 35 U.S.C. § 112, ¶ 1. Claims 2-3, 6, 11-12, and 39-40 have been canceled without prejudice. Claims 4, 5, and 47 are withdrawn. The Examiner contends that the specification provides no guidance on the structural or functional attributes of a folic acid analog, and that folate acid analogs can include molecules that do not bind to the folate receptor. Applicants respectfully traverse the Examiners rejection. The folate receptor-binding analogs of folic acid encompassed by claims 1, 8-10, 13, 16, 18-26, 28-38, and 41-46 are described in the specification of the application as required under 35 U.S.C. § 112, ¶ 1.

Folate receptor-binding analogs of folic acid are described in the specification of the captioned application. On page 13, lines 12-13 of the specification, in a paragraph describing folate receptor-binding ligands, including folic acid analogs, that can be used in accordance with the method of the invention, Applicants incorporated by reference U.S. Patent Nos. 5,108,921, 5,416,016, and 5,635,382. Each of these U.S. patents (see for example page 7, lines 26-52 of U.S. Patent No. 5,108,921), includes the following description of folate receptor-binding ligands, including folates and folic acid analogs that bind to the folate receptor:

> Folate receptors that mediate endocytotic activity have previously been identified in bacterial cells (Kumar et al., J. Biol. Chem.. 262, 7171-79 (1987)). Folic acid, folinic acid, pteropolyglutamic acid, and *folate receptor-binding* pteridines such as tetrahydropterins, dihydrofolates, tetrahydrofolates, and their deaza and dideaza analogs are preferred complex-forming ligands used in accordance with a second embodiment of this invention. The terms "deaza" and "dideaza" analogs refers to the art recognized analogs having a carbon atom substituted for one or two nitrogen atoms in the naturally occurring folic acid structure. For example, the deaza analogs include the 1-deaza, 3-deaza, 5-deaza, 8-deaza, and 10-deaza analogs. The dideaza analogs include, for example, 1,5 dideaza, 5,10-dideaza, 8,10-dideaza, and 5,8-dideaza analogs. *The foregoing folic acid derivatives are conventionally termed "folates," reflecting their capacity to bind with folate receptors*, and such ligands when complexed with exogenous molecules are effective to enhance transmembrane transport. Other folates useful as complex forming ligands for this invention are the *folate receptor-binding analogs* aminopterin, amethopterin (methotrexate), N^{10}-methylfolate, 2-deamino-hydroxyfolate, deaza analogs such as 1-deazamethopterin or 3-deazamethopterin, and 3',5'-dichloro-4-amino-4-deoxy-N^{10}-methylpteroylglutamic acid (dichloromethotrexate).

Emphasis added. Accordingly, Applicants have described in detail in the specification of the application the structural and functional attributes (*i.e.*, all of the above-described folates and folic acid analogs bind to the folate receptor) of both folates and folic acid analogs. Moreover, the structural attributes of folic acid and folic acid analogs that bind to the folate receptor are well-known in the art. Withdrawal of the rejection of claims 1, 8-10, 13, 16, 18-26, 28-38, and 41-46 under 35 U.S.C. § 112, ¶ 1 is respectfully requested.

The Examiner has rejected claim 43 under 35 U.S.C. § 102(b) over Frincke et al. or Krantz et al. or Pouletty et al. The Examiner contends that Frincke et al. or Krantz et al. or Pouletty et al. anticipates claim 43 in light of the rejection of claim 43 under 35 U.S.C. § 112, ¶ 2. In the discussion of the rejection of claim 43 under 35 U.S.C. § 112, ¶ 2, the Examiner indicates that it is not clear whether a ligand-immunogen conjugate is the only limitation of the composition of claim 43. Claim 43 has been amended to specify "a pharmaceutical composition comprising therapeutically effective amounts of a ligand-immunogen conjugate wherein the immunogen is not an antibody, a compound capable of stimulating an endogenous immune response wherein the compound does not bind to the ligand-immunogen conjugate, and a pharmaceutically acceptable carrier therefor." Accordingly, claim 43 requires that the composition comprises 1.) a ligand-immunogen conjugate, 2.) a compound capable of stimulating an endogenous immune response, and 3.) a pharmaceutically acceptable carrier. As required by claim 43, the immunogen "is not an antibody," and the compound capable of stimulating an endogenous immune response "does not bind to the ligand-immunogen conjugate." Applicants respectfully traverse the Examiner's rejection of amended claim 43 under 35 U.S.C. § 102(b). Claim 43 is not anticipated by Frincke et al. or Krantz et al. or Pouletty et al.

Anticipation exists only if all the elements of the claimed invention are present in a product or process disclosed, expressly or inherently, in a single prior art reference. *Hazeltine Corp. v. RCA Corp.*, 468 U.S. 1228 (1984). Frincke et al. discloses a ligand-immunogen conjugate and antibodies that bind to the immunogen to stabilize the ligand. Thus, Frincke et al. does not disclose a ligand-immunogen conjugate and a compound capable of stimulating an endogenous immune response wherein the compound "does not bind to the ligand-immunogen conjugate" as required by claim 43. Krantz et al. discloses a ligand-immunogen conjugate wherein the immunogen is an antibody that binds to T cells. Accordingly, Krantz et al. does not disclose a ligand-immunogen conjugate wherein the

immunogen "is not an antibody" as required by amended claim 43. Pouletty et al. discloses a ligand-immunogen conjugate for use in destroying pathogenic cells. Pouletty does not disclose a composition comprising both 1.) a ligand-immunogen conjugate and 2.) a compound capable of stimulating an endogenous immune response wherein the compound does not bind to the ligand-immunogen conjugate. "A compound capable of stimulating an endogenous immune response wherein the compound does not bind to the ligand-immunogen conjugate" is a required element of claim 43. Therefore, each of Frincke et al., Krantz et al., and Pouletty et al. fail to describe a required element of claim 43 and cannot anticipate claim 43. Withdrawal of the rejection of claim 43 under 35 U.S.C. § 102(b) is respectfully requested.

Claim 43 has also been rejected under 35 U.S.C. § 102(e) as being anticipated by Cowan. The Examiner contends that Cowan discloses a ligand-immungen conjugate for use in eliminating target cells. As discussed above, claim 43 requires that the claimed composition comprises 1.) a ligand-immunogen conjugate, 2.) a compound capable of stimulating an endogenous immune response, and 3.) a pharmaceutically acceptable carrier. Cowan discloses only a ligand-immunogen conjugate. Cowan does not disclose a composition containing both 1.) a ligand-immunogen conjugate and 2.) a compound capable of stimulating an endogenous immune response wherein the compound does not bind to the ligand-immunogen conjugate. Accordingly, Cowan cannot anticipate claim 43. Withdrawal of the rejection of claim 43 under 35 U.S.C. § 102(e) is respectfully requested.

Claims 1-8, 13, 26, 36, 43, and 47 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Roy et al. Claims 2-3 and 6-7 have been canceled without prejudice. Claims 4-5 and 47 are withdrawn. The Examiner contends that Roy et al. discloses a method of targeting tumor cells using a ligand-immunogen conjugate wherein the immunogen is an anti-T cell receptor antibody. Claims 1, 8, 13, 26, 36, and 43 require that the immunogen that is part of the ligand-immunogen conjugate "is not an antibody." Accordingly, Roy et al.

cannot anticipate amended claims 1, 8, 13, 26, 36, and 43. Withdrawal of the rejection of amended claims 1, 8, 13, 26, 36, and 43 under 35 U.S.C. § 102(b) is respectfully requested.

Claims 43 and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Frincke et al. in view of Cady et al. or Schroder or Modi. As discussed above with respect to the § 102 rejection, Frincke et al. discloses a method of stabilizing a therapeutic agent by administering a ligand-immunogen conjugate (*i.e.*, the ligand is the therapeutic agent) and antibodies that bind to the immunogen to stabilize the ligand. Accordingly, Frincke et al. does not disclose a ligand-immunogen conjugate and a compound capable of stimulating an endogenous immune response wherein the compound "does not bind to the ligand-immunogen conjugate" as required by claim 43 and its dependent claim 44. To the contrary, Frincke et al. discloses a method of administering a ligand-immunogen conjugate and a compound that does bind to the ligand-immunogen conjugate. Cady et al., Schroder, and Modi disclose prolonged release dosage forms and, thus, do nothing to overcome the insufficiencies of Frincke et al. Accordingly, claims 43 and 44 cannot be obvious over Frincke et al. in view of Cady et al. or Schroder or Modi. Withdrawal of the rejection of amended claims 43 and 44 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 1-3, 8, 18, 19, 22, 29, 31-33, 35-37, 43, and 45-47 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Cowan in view of Smith and Insel. Claims 2 and 3 have been canceled without prejudice. Claim 47 is withdrawn. The Examiner contends that Cowan discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith and Insel disclose the administration of cytokines to stimulate an endogenous immune response. Applicants respectfully traverse the Examiner's rejection. Claims 1, 8, 18, 19, 22, 29, 31-33, 35-37, 43, and 45-46 are not obvious under 35 U.S.C. § 103(a) over Cowan in view of Smith and Insel.

Applicants respectfully contend that the Examiner has not established a *prima facie* case of obviousness because the Examiner has not explained why the Examiner's

proposed modifications to the method disclosed in Cowan to obtain Applicants' claimed invention would be obvious. Establishment of a *prima facie* case of obviousness under 35 U.S.C. § 103 under the test articulated by the Supreme Court in *Graham v. John Deere Co.*, 383 U.S. 1, 148 U.S.P.Q. 49 (1966) requires that the Patent Office:

1) set forth the differences in the claim over the applied references;

2) set forth the proposed modification of the reference or references which would be necessary to arrive at the claimed subject matter; and

3) explain why the proposed modification would be obvious.

To satisfy Step 3, the Examiner must identify where the prior art provides a motivating suggestion to make the modifications proposed in Step 2. *In re Jones*, 958 F.2d 347, 21 U.S.P.Q.2d 1941 (Fed. Cir. 1992). The mere fact that the prior art may be modified as suggested by the Examiner does not make the modifications obvious unless the prior art suggests the desirability of the modification, *In re Fritch*, 922 F.2d 1260, 23 U.S.P.Q.2d 780 (Fed. Cir. 1992). Respectfully, Applicants contend that the Examiner has not made and articulated the requisite factual determinations properly antecedent to a rejection under § 103 especially with respect to explaining how the prior art suggests the desirability of the modification.

As discussed above, the Examiner indicates that Cowan discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells. The Examiner also indicates that Smith teaches the administration of cytokines along with folic acid analogs, and that Insel teaches that cytokines activate macrophages and B-cells. Although the Examiner contends that Smith teaches the use of cytokines along with folic acid analogs, the folic acid analogs described in Smith are simply used as an additional therapeutic factor for administration with cytokines. The folic acid analogs described in Smith are not conjugated to an immunogen and there is no suggestion in Smith of administering cytokines

along with folic acid analogs conjugated to an immunogen. Furthermore, neither Cowan nor Insel suggest the desirability of using cytokines in combination with a ligand-immunogen conjugate to stimulate the immune response. Accordingly, Applicants contend that the Examiner has not established a *prima facie* case of obviousness because the Examiner has not explained why the Examiner's proposed modifications to the method disclosed in Cowan to obtain the invention of Applicants' claims 1, 8, 18, 19, 22, 29, 31-33, 35-37, 43, and 45-46 would be obvious. Although the prior art may be modified as suggested by the Examiner, the modification of the therapy described in Cowan to include the cytokines described in Smith and Insel is not obvious because the prior art does not suggest the combination of a ligand-immunogen conjugate and cytokines.

In the alternative, even if the Examiner has established a case of *prima facie* obviousness, and again Applicants contend that *prima facie* obviousness has not been established, the Examiner's § 103 rejection has been overcome based on the unexpected synergism obtained with Applicants' claimed methods and compositions for use in targeting cancer cells. As stated on page 22, lines 14-17 of the specification in reference to Example 7, "[t]he results shown in Figure 7 demonstrate that the capacity of folate-FITC and IL-2 to promote long-term survival of tumor-bearing mice is strongly synergistic with low-dose IL-2 alone having a negligible effect on the survival of the mice in the absence of folate-FITC and with folate-FITC having only a minor effect." Furthermore, as stated on page 28, lines 1-2, in reference to Example 16, "[t]hese results show that IFN-α, like IL-2, acts synergistically with folate-FITC to promote long-term survival of tumor-bearing mice." Accordingly, the Examiner's § 103 rejection has been overcome based on unexpected results (*i.e.*, strong synergism) obtained with Applicants' claimed invention.

As stated in MPEP § 716.02(a), "[e]vidence of a greater than expected result may also be shown by demonstrating an effect which is greater than the sum of each of the effects taken separately (*i.e.*, demonstrating "synergism"). *Merck & Co. Inc. v. Biocraft*

Laboratories Inc., 874 F.2d 804, 10 USPQ2d 1843 (Fed. Cir.), *cert. denied*, 493 U.S. 975 (1989)." As shown by the results discussed in Examples 7 (see Fig. 7) and 16 (see Fig. 16), strong synergism is obtained with Applicants' claimed invention. In both Examples 7 and 16 a negligible effect was obtained with cytokines alone and a minor effect was obtained with the ligand-immunogen conjugate, but a strong synergistic effect was obtained with the combination of cytokines and the ligand-immunogen conjugate. As shown in Figs. 7 and 16, this effect was much greater than the sum of each of the effects taken separately. Accordingly, under MPEP § 716.02(a), an unexpected result is obtained with Applicants' claimed invention (*i.e.*, a strong synergistic effect).

Moreover, the Federal Circuit in *In re Dillon* specifically permitted Applicants for a patent to rebut a *prima facie* case of obviousness by "showing that the claimed compositions possess *unexpectedly improved properties or properties that the prior art does not have.*" *In re Dillon*, 919 F.2d 688, 692, 16 U.S.P.Q. 2d 1897, 1901 (Fed. Cir. 1990) (emphasis added). The prior art does not have the properties of Applicants' claimed invention because the ligand-immunogen conjugates of Cowan were not combined with the cytokines described in Smith and Insel and the prior art makes no mention of a strong synergistic effect between a ligand-immunogen conjugate and cytokines in destroying cancer cells as is obtained with Applicants' claimed invention. Accordingly, even if the Examiner has made a *prima facie* case of obviousness, and Applicants contend that the Examiner has not, the Applicants have rebutted the Examiner's *prima facie* case by demonstrating that Applicants' claimed methods and compositions have unexpected properties that the prior art does not have. Withdrawal of the rejection of amended claims 1, 8, 18, 19, 22, 29, 31-33, 35-37, 43, and 45-46 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 1-3, 6-8, 11, 13, 18-26, 28-35, 38, 39, 43, and 45-47 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Pouletty in view of Smith and Insel and Mazzoni et al. Claims 2-3, 6-7, 11, and 39 have been canceled without prejudice. Claim 47

is withdrawn. The Examiner contends that Pouletty discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith, Insel, and Mazzoni disclose the administration of cytokines to stimulate an endogenous immune response. Thus, the Examiner's arguments in support of this rejection are similar to those set forth in the rejection over Cowan in view of Smith and Insel. Applicants' arguments in response to the rejection over Cowan in view of Smith and Insel apply with equal force to the rejection over Pouletty, Smith, Insel, and Mazzoni. Withdrawal of the rejection of amended claims 1, 8, 13, 18-26, 28-35, 38, 43, and 45-46 under 35 U.S.C. § 103(a) over Pouletty, Smith, Insel, and Mazzoni is respectfully requested.

Claims 39 and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Pouletty in view of Leamon et al. Claims 39 and 40 have been canceled without prejudice.

Claims 1-3, 6-13, 18-26, 28-35, 38-43, and 45-47 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Pouletty in view of Leamon et al. and Smith and Insel and Mazzoni et al. Claims 2-3, 6-7, 11-12, and 39-40 have been canceled without prejudice. Claim 47 is withdrawn. The Examiner contends that Pouletty discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith, Insel, and Mazzoni disclose the administration of cytokines to stimulate an endogenous immune response. Leamon et al. is directed to claims 39 and 40 which have been canceled. Thus, the Examiner's arguments in support of this rejection are similar to those set forth in the rejection over Cowan in view of Smith and Insel. Applicants' arguments in response to the rejection over Cowan in view of Smith and Insel apply with equal force to the rejection over Pouletty, Smith, Insel, and Mazzoni. Withdrawal of the rejection of amended claims 1, 8-10, 13, 18-26, 28-35, 38, 41-43, and 45-46 under 35 U.S.C. § 103(a) over Pouletty, Smith, Insel, and Mazzoni is respectfully requested.

Claims 1-3, 6-9, 11, 13, 16-35, 38, 39, and 41-47 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Pouletty in view of Smith and Insel and Mazzoni et al. and further in view of Cady et al. or Schroder or Modi. Claims 2-3, 6-7, 11, 17, and 39 have been canceled without prejudice. Claim 47 is withdrawn. The Examiner contends that Pouletty discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith, Insel, and Mazzoni disclose the administration of cytokines to stimulate an endogenous immune response. Thus, the Examiner's arguments in support of this rejection are similar to those set forth in the rejection over Cowan in view of Smith and Insel. Applicants' arguments in response to the rejection over Cowan in view of Smith and Insel apply with equal force to the rejection over Pouletty, Smith, Insel, and Mazzoni. Cady et al. or Schroder or Modi disclose prolonged release dosage forms and do not overcome the insufficiencies of Pouletty, Smith, Insel, and Mazzoni. Withdrawal of the rejection of amended claims 1, 8-9, 13, 16, 18-35, 38, and 41-46 under 35 U.S.C. § 103(a) over Pouletty, Smith, Insel, and Mazzoni is respectfully requested.

Claims 1-3, 8, 16-19, 22, 29, 31-33, 35-37, 43, and 45-47 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Cowan in view of Smith and Insel and further in view of Easty et al. and Walker-Daniels et al. Claims 2-3 and 17 have been canceled without prejudice. Claim 47 is withdrawn. The Examiner contends that Cowan discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith and Insel disclose the administration of cytokines to stimulate an endogenous immune response. Thus, the Examiner's arguments in support of this rejection are similar to those set forth above in the rejection over Cowan in view of Smith and Insel. Applicants' arguments in response to the rejection over Cowan in view of Smith and Insel apply with equal force to this rejection. Easty et al. and Walker-Daniels et al. are directed to claim 16 and these references do not overcome the insufficiencies of Cowan, Smith, and

Insel. Withdrawal of the rejection of amended claims 1, 8, 16, 18-19, 22, 29, 31-33, 35-37, 43, and 45-46 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 1-3, 6-8, 11, 13, 16-26, 28-35, 38, 39, 43, and 45-47 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Pouletty in view of Smith and Insel and Mazzoni et al. and further in view of Easty et al. and Walker-Daniels et al. Claims 2-3, 6-7, 17, and 39 have been canceled without prejudice. Claim 47 is withdrawn. The Examiner contends that Pouletty discloses the use of a composition containing a ligand-immunogen conjugate to target cancer cells, and that Smith, Insel, and Mazzoni disclose the administration of cytokines to stimulate an endogenous immune response. Thus, the Examiner's arguments in support of this rejection are similar to those set forth in the rejection over Cowan in view of Smith and Insel. Applicants' arguments in response to the rejection over Cowan in view of Smith and Insel apply with equal force to the rejection over Pouletty, Smith, Insel, and Mazzoni. Easty et al. and Walker-Daniels et al. are directed to claim 16 and these references do not overcome the insufficiencies of Pouletty, Smith, Insel, and Mazzoni. Withdrawal of the rejection of amended claims 1, 8, 13, 16, 18-26, 28-35, 38, 43, and 45-46 under 35 U.S.C. § 103(a) is respectfully requested.

CONCLUSION

The foregoing amendments and remarks are believed to fully respond to the Examiner's rejection. The amended claims are in condition for allowance. Applicants respectfully request allowance of the claims, and passage of the application to issuance.

Respectfully submitted,

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